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1 Level Web Security, May 7-11, 2002 (hereinafter, "Scott").

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3 **The Claims**

4 **Claim 1** (as amended) recites a method, comprising:

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- 6 • receiving data input through a web page from a client device;
 - 7 • referencing a declarative module to determine a client input security screen to apply to the data input from the client device, wherein **the declarative module comprises:**
 - 8 • **a global section that includes at least one client input security screen that applies to any type of client input value; and**
 - 9 • **an individual values section that includes at least one client input security screen that applies to a particular type of client input value; and**
 - 10 • applying multiple client input security screens to the data input from the client device; including at least one client input security screen from the global section of the declarative module and at least one client input security screen from the individual values section of the declarative module, wherein the client input security screens are distinct from one another, and wherein **one or more predetermined symbols are removed without replacement from the data input.**

11 (Emphasis added.)

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17 In making out the rejection of this claim, the Office argues that its subject
18 matter is anticipated by Scott. Applicant respectfully disagrees and traverses the
19 Office's rejection. For the reasons set forth below, the rejection for anticipation is
20 invalid and should be withdrawn.

21 Specifically, Scott fails to provide that one or more predetermined symbols
22 are removed without replacement from the data input, as positively recited by the
23 subject matter of this claim, as amended.

24 Specifically, Scott provides for HTML security policies and techniques,
25

1 based upon the use of Constraints (e.g., parameter name "p1" must be of type
2 "int", etc.), and Transformation rules (e.g., predetermined meta-characters to be
3 replaced by their respective numerical representations - a procedure referred to as
4 HTML-Encode, etc.). (Pages 4-6 of Scott). Scott further states that:

5
6 "For this reason, we adopt the convention that *all* parameters are HTML-
7 encoded unless explicitly specified otherwise in the security policy." (Page
8 6 of Scott) (Emphasis theirs).

9 Thus, Scott contemplates an operation wherein all *meta-characters* within
10 the respective *parameters* of a user input are replaced with their corresponding
11 numerical representations. Therefore, each meta-character is replaced with some
12 representative value. However, such a replacement operation is not the same as
13 removing, without replacement, one or more predetermined symbols from the
14 data input, as recited by the subject matter of claim 1, as amended. Thus, Scott
15 fails to provide at least one feature as positively recited by the subject matter of
16 this claim.

17 Furthermore, Scott is completely lacking a declarative module that
18 comprises a global section that includes at least one client input security screen
19 that applies to any type of client input value, and an individual values section that
20 includes at least one client input security screen that applies to a particular type of
21 client input value, as further recited by the subject matter of claim 1. The
22 immediately foregoing deficiency of Scott has been argued previously in the
23 prosecution of this matter and is not reiterated here in the interest of brevity.

24 In view of the foregoing deficiencies of Scott, the Applicant contends that
25 the § 102 rejection against claim 1 (as amended) is unsupportable and must be

1 withdrawn. The Applicant asserts that claim 1, as amended, is allowable.

2 **Claims 4-11** are allowable at least by virtue of their dependence from an
3 allowable base claim, as well as for their own respectively patentable subject
4 matter.

5 **Claim 12** (as amended) recites a system, comprising:

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- 7 • a web page server unit configured to provide one or more web pages
to one or more client devices over a distributed network;
- 8 • means for receiving client input data;
- 9 • **a declarative module configured to include multiple client input
security screens that declare screening rules for client input,
wherein the declarative module comprises:**
- 10 • **a global section that includes one or more client input security
screens that are applied to all types of client input; and**
- 11 • **an individual values section that includes one or more client
input security screens that are applied to specified types of client
input; and**
- 12 • a client input security screening unit configured to apply the
13 screening rules for client input to the client input data and to perform
14 one or more actions on invalid client input data, wherein the
15 screening rules are from distinct client input security screens from
16 the global section and the individual values section, and wherein **the
client input security screening unit is further configured to
17 remove without replacement one or more predetermined
symbols from the client input data.**

18 (Emphasis added.)

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20 In making out the rejection of this claim, the Office argues that its subject
21 matter is anticipated by Scott. Applicant respectfully disagrees and traverses the
22 Office's rejection. For the reasons set forth below, the rejection for anticipation is
23 invalid and should be withdrawn.

24 Further, Scott fails to provide a system (or anything else), wherein the
25 client input security screening unit is further configured to remove without

1 replacement one or more predetermined symbols from the client input data, as
2 positively recited by the subject matter of this claim, as amended.

3 Specifically, Scott further fails to provide a declarative module configured
4 to include multiple client input security screens that declare screening rules for
5 client input, wherein the declarative module comprises a global section that
6 includes one or more client input security screens that are applied to all types of
7 client input, and an individual values section that includes one or more client input
8 security screens that are applied to specified types of client input, as positively
9 recited by the subject matter of claim 12.

10 In view of the foregoing deficiencies of Scott, and for reasons analogous to
11 those argued above in regard to claim 1 (as amended), the Applicant asserts that
12 the § 102 rejection of claim 12, as amended, is unsupportable and should be
13 withdrawn. The Applicant asserts that claim 12 (as amended) is allowable.

14 **Claims 16-20** are allowable at least by virtue of their dependence from an
15 allowable base claim, as well as for their own respectively patentable subject
16 matter.

17 **Claim 21** (as amended) recites one or more computer-readable media
18 containing computer-executable instructions that, when executed on a computer,
19 perform the following steps:

- 20 • serving a web page to a client over a distributed network;
- 21 • receiving client input via the web page;
- 22 • comparing the client input with multiple and distinct client input
23 security screens stored in a security declarative module, wherein **the**
24 **security declarative module includes a global section configured**
25 **to screen all types of client input values and an individual values**
section configured to screen particular types of client input
values;
- if invalid client input is detected, performing a screening action on
the invalid client input as indicated by the security declarative

1 module; and

- 2 • wherein the client input security screens included in the security
- 3 • **wherein one or more predetermined symbols are removed**
- 4 **without replacement from the client input.**

5 (Emphasis added.)

6 In making out the rejection of this claim, the Office argues that its subject
7 matter is anticipated by Scott. Applicant respectfully disagrees and traverses the
8 Office's rejection. For the reasons set forth below, the rejection for anticipation is
9 invalid and should be withdrawn.

10 Specifically, Scott fails to provide for any method or means, wherein one or
11 more predetermined symbols are removed without replacement from the client
12 input, as positively recited by the subject matter of this claim.

13 Further, Scott fails to provide that the security declarative module includes
14 a global section configured to screen all types of client input values and an
15 individual values section configured to screen particular types of client input
16 values, as positively recited by the subject matter of claim 21, as amended.

17 In view of the foregoing deficiencies of Scott, and for reasons analogous to
18 those argued above in regard to claim 1 (as amended), the Applicant asserts that
19 the § 102 rejection of claim 21, as amended, is unsupportable and should be
20 withdrawn. The Applicant asserts that claim 21 (as amended) is allowable.

21 **Claims 24-28** are allowable at least by virtue of their dependence from an
22 allowable base claim, as well as for their own respectively patentable subject
23 matter.

